

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

PATRICK KENNEALLY, in his official
capacity as McHENRY COUNTY
STATE'S ATTORNEY and on behalf of
the PEOPLE OF THE STATE OF
ILLINOIS, and McHENRY COUNTY,
body politic and corporate,

Plaintiffs,

v.

No. 3:23-cv-50039

KWAME RAOUL, in his official capacity
as Illinois Attorney General, and
GOVERNOR J.B. PRITZKER, in his
official capacity as Governor of the State of
Illinois,

Defendants.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that Defendants Kwame Raoul and JB Pritzker hereby remove the action commenced on January 26, 2023, in the Circuit Court of the Twenty-Second Judicial Circuit, McHenry County, Illinois, captioned *Patrick Kenneally v. Kwame Raoul and JB Pritzker*, No. 2023 CH 5. The complaint is attached as Exhibit 1. All defendants who have been properly joined and served join in or consent to the removal of the action, and this notice is filed within 30 days of Defendants' receipt of the complaint. The action is removable pursuant to 28 U.S.C. § 1441(a) because it arises under the Constitution, laws, or treaties of the United States and therefore the Court has original jurisdiction over it pursuant to 28 U.S.C. § 1331. In particular, the action seeks a declaration that provisions of Public Act 102-1116, enacted by the General Assembly of Illinois and signed into law by the Governor of Illinois in January 2023,

violate the Second Amendment to the United States Constitution, as incorporated against the State of Illinois by the Fourteenth Amendment to the United States Constitution.

Dated: January 27, 2023

Respectfully submitted,

/s/ Darren Kinhead

Darren Kinhead, ARDC No. 6304847

Office of the Attorney General

100 West Randolph Street

Chicago, IL 60601

(773) 590-6967

Darren.Kinhead@ilag.gov

CERTIFICATE OF SERVICE

I certify that I will cause to be served a copy of the foregoing *Notice of Removal* via electronic mail upon those listed below on January 27, 2023:

Patrick D. Kenneally

Troy C. Owens

Office of the McHenry County State's Attorney

2200 North Seminary Avenue

Woodstock, IL 60098

(815) 334-4159

PDKenneally@mchenrycountyil.gov

TCOWens@mchenrycountyil.gov

/s/ Darren Kinhead

Darren Kinhead, ARDC No. 6304847